

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	
)	
Michael A. Wolf,)	
)	
Debtor.)	No. 19 C 1978
_____)	
)	
N. Neville Reid, not individually,)	
but solely in his capacity as Chapter 7)	
Trustee for the bankruptcy estate of)	
Michael A. Wolf)	
)	(Bankruptcy Case No. 14 B 27066)
Plaintiff,)	
v.)	
)	
MMQB, Inc., Michael Wolf,)	
Scott Wolf, et al.)	
)	
Defendants.)	

MOTION TO EXTEND TIME TO FILE REPLY BRIEF

N. Neville Reid, not individually but solely as chapter 7 trustee (the “Trustee”) of the bankruptcy estate of Michael Wolf (the “Debtor”), as his Motion To Extend Time To File Reply Brief, states as follows:

1. On February 14, 2025, the court set a briefing schedule on the Trustee’s Motion For An Order Of Contempt Against Michael Wolf (the “Motion For Contempt”).
2. Pursuant to the briefing schedule, the Trustee’s reply brief is due on March 20, 2025.
3. Michael Wolf’s Response to the Trustee’s Motion For Contempt includes new “responses” to the relevant document requests which are different from his prior responses to the same requests as well as his testimony at the prior hearings in this matter. As a result, substantial work needed to be done in order to advise the Court of the prior record.

4. In addition, counsel's firm is transitioning to a new legal research platform and the new platform apparently contains codes which must be removed from the reply brief prior to filing, in addition to other issues related to the new platform, which make the filing of the reply brief on March 20, 2025 impossible.

5. No other extensions have been requested.

6. A seven (7) day extension of time for the Trustee to file his reply in support of his Motion For Turnover will not cause undue delay.

7. Counsel for the Trustee was not able to contact Michael Wolf regarding this request because he is pro se.

Wherefore, for all of the foregoing reasons, the Trustee requests that the time to file his Reply Brief in support of his Motion For Order Of Contempt Against Michael Wolf be extended seven (7) days until March 27, 2025, and for all other relief this court deems just.

Dated: March 20, 2025

Respectfully Submitted,

N. Neville Reid, not individually, but solely
in his capacity as chapter 7 trustee for the
bankruptcy estate of Michael A. Wolf,

/s/ Daniel P. Dawson
One of his attorneys

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CERTIFICATE OF SERVICE

I, Daniel P. Dawson, certify that on March 20, 2025, I caused a copy of the foregoing to be filed electronically through the Court's CM/ECF filing system which will cause the document to be served upon all parties electronically through the Court's CM/ECF filing system, and also served additional parties as listed on the attached Service List as indicated.

/s/ Daniel P. Dawson

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SERVICE LIST

Via ECF Service

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Via U.S. First Class Mail

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